

United States District Court For District of Minnesota

Michael Romeo Geraci  
16492-041  
Plaintiff  
vs,

Case No.

(To be assigned by Clerk of Court)

1. Ashley Sykora, Program Director, VOA

Demand for Jury Trial

2. Josue Garcia, Senior Casemanager, VOA

yes

no

3. Felicia Perez, Case manager, VOA

4. Ryan Korhonen, Field Verification Technician, VOA

5. Ned G. Wohlman, Jail Administrator, R.C.J

6. Brenda Mart, Regional Reentry Manager, FBCP

7. Jeffery George, Disciplinary hearing officer, FBCP

8. Volunteers of America, Entity

9. Renville County Jail, Entity

RECEIVED BY MAIL

MAR 16 2021

CLERK, U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

Complaint for civil Rights violation under Bivens, Action

28 USCS § 1331 also alternatively Complaint for Violation

of Civil Rights under 42 U.S.C.S. § 1983 Jurisdiction,

28 USCS § 1331 and 1343(3).

Plaintiff is prose and is confused as to what authority contractors

would be acting since they are licenced by state so "color of state" yet

I am Federal inmate and Defendants have federal contracts thus "federal authority"

So during screening process this court can decide which if either or both  
Should go forward.

I. Previous Lawsuits

A. Have you begun other lawsuits in state or Federal court dealing with same facts

SCANNED

MAR 16 2021

U.S. DISTRICT COURT MPLS

in this action or otherwise relating to your imprisonment in the last three years?

Yes

No

B. If you answer to (a) is "yes", describe each lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs: Michael Romeo Geraci

Defendants: Ned G Wohlman, United States of America

2. Court (If federal court, name the district. If state court, name the state and county.):

District of Minnesota

3. Case Number: 0:20-cv-02661-PAM-ECW

Appeal No. 21-01346 USCA 8th Cir.

4. Name of judge assigned to the case: Magrison

5. Cause of action (Cite the statute under which you filed and write a brief statement of the case): 28 USC 2241 habeas corpus, Due process violation. Defendants in current case violated FBOP Policy, Federal Code of Regulations and petitioners 5th Amendment due process rights in prison disciplinary procedures.

6. Disposition or final determination of the case (for example, dismissed or appealed).

dismissed,Appealed

7. Approximate date of filing the lawsuit:

Attempt to file on 12-2-2020, seized by Ned Wohlman, received by court 12-28-2020

8. Approximate date of disposition or final determination of the lawsuit:

01-28-2021

\*\*\*Attach a copy of the disposition or final determination of the lawsuit if it was filed in a court other than the U.S. District Court for the District of Minnesota.\*\*\*

Have You begun other lawsuits on state or federal dealing with same facts in this action or otherwise relating to your imprisonment in the last three years?

Yes

No

B. If you answer to (a) is "yes", describe each lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs: Michael Romeo Geraci

Defendants: Ned G. Wohlman and Unknown Jailers

2. Court (If federal court, name the district. If state court, name the state and county.):

District of Minnesota

3. Case Number: 02-24-2021

4. Name of judge assigned to the case:

5. Cause of action (Cite the statute under which you filed and write a brief statement of the case): 42 USC 1983, Civil Rights violation. Mail tampering specifically blocking access to courts as it pertained to a 28 USC 2241 Writ of habeas corpus challenging Defendants in this cases Disciplinary findings but had Ned Wohlman listed as Respondent. Ned Illegally seized and opened my mail and forwarded info to the FBI. He held my motion for over 3 weeks. 1st Amendment, 5th Amendment

6. Disposition or final determination of the case (for example, dismissed or appealed).

~~Dismissed~~, ~~Appealed~~ pending still

7. Approximate date of filing the lawsuit: ~~03/16/2021~~ 2-24-2021

8. Approximate date of disposition or final determination of the lawsuit:

Pending

~~06/05/2021~~

\*\*\*Attach a copy of the disposition or final determination of the lawsuit if it was filed in a court other than the U.S. District Court for the District of Minnesota.\*\*\*

If there was more than one lawsuit, describe the additional lawsuits on a separate sheet of paper answering the same questions in the same order as above in Question 1(b). Label this information as Question 1(b).

Check here if additional sheets of paper are attached.

## II. PRESENT PLACE OF CONFINEMENT

A. Is there a prisoner grievance procedure in the institution?

Yes

No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure?

Yes

No

C. If you answered "yes" to question II.B.:

1. What steps did you take: I filed a Grievance to Brenda Mart and to the Regional Directors office in Kansas City Missouri
2. What was the result? I never received any responses

\*\*\*Attach a copy of the decision or disposition received from the prisoner grievance procedure.\*\*\*

D. If you answered "no" to question II.B., explain why you did not present the facts relating to your complaint in a prisoner grievance procedure.

## III. PARTIES

List your name, prisoner number, address and telephone number. Do the same for any additional plaintiffs. Attach an additional sheet of paper, if necessary.

A. Name of Plaintiff: Michael Romeo Geraci

Prisoner Number 16492041

Address Renville County Jail, 104 South 4th street, Olivia MN, 56277

B. Additional Defendants

Ned G Wohlman, Renville County Jail

Jail Administrator and individual capacity

105 South 5th Street, Suite 210, Olivia MN 56277

Brenda Mort, Federal Bureau of Prisons

Regional Reentry Manager and individual capacity

300 South 4th Street, Suite 1210, Minneapolis MN 55415

Jeffery George, Federal Bureau of Prisons

Discipline Hearing Officer

North Central Regional Office, Tower II, 8th Floor, 400 State Ave, Kansas City, Kansas 66101

Volunteers of America MN/WI (Roseville operation)

Physical Entity Address: 1771 Kent Street Roseville MN 55113

VOA Corporate Headquarters: 1160 Duke St. Alexandria, VA 22314

Operating Roseville VOA under Minnesota Department of Corrections license and federal

Contractor to house federal inmates.

Renville County Jail - Entity

105 South 5th Street, Suite 210, Olivia MN 56277

Minnesota Department of Corrections Certified/Sheriffs office/federal contract RRG

Additional Plaintiffs:

Provide each defendant's full name, official position, and place of employment. Attach additional sheets of paper, if necessary.

B. Name: Ashley Sy Kara, Volunteers of America RRC,

Both

Official Position: Program Manager/ Individually capacity

Employer's Address: 1771 Kent street Roseville MN 55113

Ryan Korhonen, Volunteers of America RRC  
Field Verification Technician and Individual Capacity  
1771 Kent street Roseville MN 55113

Additional Defendants: Josue Garcia, volunteers of America RRC  
Senior Case Manager and Individual capacity  
1771 Kent Street, Roseville MN 55113  
Felicia Perez, Volunteers of America RRC  
Case Manager and Individual capacity  
1771 Kent street, Roseville MN 55113

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper as II.A. for Plaintiffs and II.B. for Defendants.

**IV. STATEMENT OF THE CLAIM**

Describe in the space provided below the basic facts of your claim. Describe how each individual defendant is personally involved, including dates, places and specific wrongful acts or omissions by each defendant. Each factual allegation should be provided in separately lettered paragraphs, beginning with letter A. Do not make any legal arguments or cite any cases or statutes.

A. On July, 17, 2020 Plaintiff arrived at VOA ROSEVILLE. Petitioner was never given an "orientation" or a rule packet of any sort. On July 21, 2020 Defendant Felicia Perez Knowingly forged "COVID" on this socalled Federal acknowledgement of the rules of the VOA and that they were the same as the Federal Bureau of Prisons Without actually holding an orientation and explaining any of this to me. This is Required By the Federal Bureau of Prisons as "Notice to inmates of the Inmate Discipline Program". Staff Is Supposse to deliver this promptly at my arrival but the VOA is a Contract NON Federal facility I didn't even know they had disciplinary process I thought I was on USPQ, Subject to violations, Even knowing this is clearly part of FBOP policy and inmates Rights and responsibilities Defendant felicia Perez thought her omission would never get caught up... Then on 9-30-2020, Defendant Ashley Sy Kara writes me two FBOP Standard Incident reports; 1 for an Serious Assault 102 and another for Escape 102,

(I'll address these incident reports further later). I didn't receive these incident reports while I was actually still at the VOA because on 09/30/2020 at 12:17 AM I left the VOA RRC. I had intentions of speaking with my PO in a few weeks to turn myself in to accept my "violation" since I was unaware that the VOA/FBOP rules, Disciplinary programs etc and never acknowledged nor agreed to them... During this time of absence from the facility Defendant Perez could have come clean about her "Omission" but instead she remained silent and so did Defendant Josue thus now this "Omission" has become something more sinister it has become a fabrication of a key piece of evidence in my whole Disciplinary proceedings, which the end result had me placed in Jail, max custody, my image I worked so hard at building at being reformed destroyed. At numerous opportunities Defendant Felicia Perez could have come forward to "straighten" out her mistake which would have resulted in both incident reports having to be thrown out for "Technical procedural defects" but defendant through a careless disregard for my well-being and a selfish concern about her job and her personal piece in a "Conspiracy" of retaliation against plaintiff for his whistleblowing to St. Paul Pioneer Press on 09/02/2020, which was a front page, above the fold story of the day, felicia and her fellow VOA defendants conspired to retaliate against plaintiff and through discovery it will show how most inmates who came to Renville County Jail from Roseville RRC never received sanctions, some never even received incident reports and ones who had Felicia Perez as case manager who arrived at VOA will possibly never have received "notice of the Inmate Discipline Program" and also got "COVIPS" Signatures on their federal acknowledgements like mine. Felicia Perez is Employed with the VOA, which is licensed through the Minnesota Department of Corrections thus giving her authority, or at least the appearance or color of it under state law of Minnesota also the VOA is a federal Contractor so she operates under a guise of having federal authority or the color of it.

With that in mind, Felicia Perez, knowingly with deliberate indifference conspired with others named and unknown to violate, my 5th Amendment procedural rights, 4th amendment false imprisonment, She fabricated documents and subjected me to conditions at the VOA and later in jail that were in violation of my 8th Amendment my family has suffered, I have suffered, my health, She works at a supposed Christian faith based program yet breaking all of Jesus's commandments.

B. On or about 7/21/2020, Defendant Senior Case manager Josue Garcia by F BOP protocol had to review that Felicia Perez in fact been in compliance with her official duties by making sure I had done my proper orientation and received all the proper documentation including "Notice to INMATE of the INMATE DISCIPLINE Program" which Not only is a F BOP Policy but also a Federal Code of Regulation, thus as Senior Case manager part of Defendant Josue Garcia's official duties to review these documents. It's possible he didn't know my name wasn't "COVID" but I doubt it. In Mid August Volunteers of America Roseville where plaintiff was housed and defendant Josue was working. The facility experienced a wide spread Covid 19 outbreak that VOA staff tried to "Cover up". I whistleblowed and contacted Minnesota Department of Health and Pioneer press and U.S. Congresswoman Betty McCollum along with several state officials who all started to contact the VOA then on September 2, 2020 the St. Paul Pioneer Press Ran Front Page Above the fold a story about the COVID-19 out Break at the VOA-Roseville RPL facility. Plaintiff immediately began to experience retaliation and threats of retaliation from VOA staff and Defendant Josue Garcia specifically extending Quarantine beyond any other residents at the VOA who tested negative, I was told I could not return to work, church nor

do any in person interviews with press, which there had been 2 other  
 request to do in person interviews made to Josue and ASHley Sykora which  
 were denied because I was "exposed to covid" which was a lie. I was also  
 told specifically a threat from defendant Garcia that any hopes I had of  
 going to home confinement were dashed it was not going to happen because I  
 was a Rat... At the time my Home Detention Date was about June 15, 2020  
 so I was well past eligibility date, Josue stated numerous times there was a waiting  
 list... After the COVID-19 Lockdown He processed a bunch of federal inmates  
 including inmates who just arrived after me yet had no jobs but were  
 able to leave on home confinement, I fit all criteria for H.C. it was clear  
 this was retaliatory... Mr. Garcia went on to tell me that I would be a "program  
 failure" and "that people might learn I was an ex gang member"... I wrote a grievance to  
 Ashley Sykora which was never replied to... Mr. Josue Garcia who is a close  
 associate of the Latin Kings gang and "West Siders" (west side St. Paul gang)  
 which were rival gangs of the plaintiff's previous life before prison before  
 he turned himself over to God, Jesus Christ... In any case... The individual Mathew  
 Taylor, the resident, who Plaintiff was charged in the Incident report no. of 101  
 Seriously Bodily assaulting On 09/29/2020 was actually an agent of Josue Garcia... In the report  
 it stated How we exchanged words I walked away walked back exchanged more than punched him  
 6 times... Well the facts are simply this Mr. Taylor Threatened me.. Like this in the Dining  
 Area amongst many other gang members and criminals he said that "Josue told him"  
 that I was a "Drop out" of the "East Side Boys" gang and that "Josue had given  
 him the Green light" to get some of his clique "Hitsquad Westside" and get

at me the next time I leave the facility "So I better just checkin" and run right now because I was was going back to prison. When I said what happened if I beat him and his "Hitsquad" clique homeboys up just like I did back when we was kids and he shows up beat up too? he said he'd get a pass and I'd still go back to prison... so I snapped and tested the theory and well he was right.. The federal Bureau of Prisons has NO Self Defense Law if you push someone back you are guilty of fighting, Mr. Taylor fought Back feably as it may have been, just like when we were Teenagers, he still can't fight but Defendant Josue Garcia Conspired to have me bodily harmed he just thought because mathew taylor was much larger he would scare me or hurt me. Defendant Garcia violated my 8th amendment by Cruel and unusual punishment by retaliating in this way. To add insult to injury and to prove my conspiracy Mathew Taylor Never received any Disciplinary Sanctions just as he told me he had a "green light". Defendant Garcia Ignored my please during my UDC hearing, he ignored FBOP Policy and federal regulations as to the fact that Both The Incident report is untimely, UDCs untimely thus violating 5th Amendment procedural due process right on Both incident reports, As Defendant Josue Garcia is Trained and Qualified it is official Duty to understand FBOP Policy, FBOP Policy P5270.09 Inmate Discipline Program which dictates how the process runs in RRCS as well, an incident report must be delivered within 24 hrs unless its referred to FBI for prosecution, Plaintiff's Escape was, and was Declined on OCT, 7, 2020, FBOP Policy then goes on to say after AUSA Declines prosecution Delivery should be made by next business day, if it can not be made a reason should be Noted...

Next is the UDC hearing which will be within 5 days... "If you are Escaped or otherwise absent from custody the UDC will will conduct a review in your absence at the institution where you were last confined. The UDC must document its reasons for excluding inmates from the hearing..."

See Code of Federal Regulations 541.7 (d)(3) Unit Discipline Committee

So its clear that Josue ignored FBOP Policy Innate Discipline Program and also the Code of federal Regulations which was his official duty as committee chair at the UDC hearing when I told him that all this was untimely and violated my due process, I wanted a FBOP staff rep I was offered corrupt VOA Staff that Doesn't know FBOP Policy or Renville County Jail staff to protect my

Due Process rights. Defendant Josue ignored that I told him that Mr. Taylor

fought back, instead he recommend I still be found guilty of a 101 serious assault

which is the 2nd most serious FBOP violation only 100 killing is worse, 101 is

reserved usually for assaults resulting in hospitalizations, there is elements to the offense

but the Retaliatory nature of Josue and the VOA was out for Blood.. I had

No opportunity to even know at the time at this hearing that they were relying

on some "Federal acknowledgement" form that I never saw and never signed this

"Technically" I can't be held liable for violations and sanctions I had no notice

of I didn't see this form until I filed habeas corpus and it was provided to me

but Josue Garcia had seen this form and he deliberately knew that Defendant

Felicia Perez had fabricated this form and they were now using this as a lodestone

in maintaining that I had notice and acknowledged that I knew the VOA RRC

was under the FBOP Rules and not USPO. Defendant Jose Garcia is an Employee

of the Volunteers of America MN/WI Roseville RRC, which is licensed to operate under the Minnesota Department of Corrections, thus making his authority under the color of state authority also the VOA has a "Federal contract" to house federal inmates thus he also imposed sanctions on me in the guise under the color of federal law. He is guilty of conspiring to falsify/fabricate documentation to "prosecute" my disciplinary proceedings which have had my "liberty" stripped and my Good time and sentence extended. He has violated my 5th Amendment due Process, Procedural due Process rights in my prison disciplinary proceedings in his official duties in a knowing and deliberate vindictive way... He has put me in physical danger and my physical health and family in struggle, he has violated my 8th Amendment as stated Above and with the Due Process violation and the conspiracy with other defendants at the VOA relating the fabrication and cover up of Defendant Felicia Perez forged "COVID" signature on the Federal acknowledgement Defendant Garcia is guilty of false imprisonment and finally Josue Garcia, According to FBoP Policy and CFR must be a qualified individual to hold a UDC committee, thus be aware that the two 700 series violations he should never even held a UDC but simply referred the whole thing to the DHO see Q&A CFR 541.7(g) It's clear that Josue Garcia abused his power under both the color of state and federal law

C. On 11/19/2020 Defendant Ryan Korthoney Did his "investigation" as part of of the Inmate Discipline Program FBoP of both my incident reports both written on 09/30/2020 by defendant Ashley Sykorn, the first incident report was a 107 violation for Serious bodily harm, Assault of another person, I maintained that I wanted a staff

Rep if NOT Brenda Mort then another individual actually employed with the FBOP  
 because the offer of VOA staff or RCJ staff as a staff rep was ineffective  
 Neither VOA staff or RCJ staff are familiar with FBOP Policy nor Code of federal  
 regulations thus unable to protect my "Due process" which is the main purpose  
 of a staff rep... Informed Defendant Korhonen that I never "Assaulted" anyone I  
 was at the most guilty of a fight... Defendants filing out of the investigation  
 portion of incident Report I informed him that this incident report was untimely  
 if it had never been referred for prosecution and thus needed to be tossed out,  
 In his investigation, Defendant in his official Duties was strained to understand FBOP  
 Policy and its difference in Violations thus in his recommendation he easily and  
 should have recommended that 102 be dropped to a 201 fighting with another inmate.  
 Defendant never brought up the "federal acknowledgement" form or I would have  
 contested it on the spot and I find it likely that he was also aware that  
 my name was not "COVID" and that I never received the Required "Notice  
 to inmates of the Inmate Discipline Program" and VARRC rules and regulations as  
 required by FBOP Policy and Code of federal regulations, yet Defendant Ryan Korhonen  
 chose to deliberately ignore any and all of his duties as an investigator besides  
 taking down part of my statement and saying I did it its clear that  
 he chose not to "investigate" my claims despite all the timeliness claims raised  
 against Defendant Josue Garcia, these exact timeliness claims are also  
 against Defendant Korhonen. On the 2nd incident report its much of the  
 same except it was referred for prosecution which was declined on  
 Oct, 7, 2020, FBOP Policy and Code of federal Regulations are clear on the

Matter, just because an inmate is "escaped or otherwise absent from custody" the disciplinary process goes on there just must be a notation and reason at each step of the disciplinary process as to why the inmate is released is excluded, so my timeliness complaint Defendant ignored is akin to ignoring a "statute of limitations" or "untimely/faulty indictment" actual innocence doesn't matter now it's a matter of 5th Amendment procedural Due process violations which Defendant clearly took part in. in both incident Reports. Defendant is employed with the Volunteers of America which is licensed through the Minnesota Department of Corrections under the color of state law is his actions and authority also the VOA is a federal contractor thus giving defendant the ability to investigate and hold authority of me with the color of federal law and authority... Defendant conspired with Josue Garcia, Ashley sylkorn and felicia Perez to retaliate against plaintiff for the COVID-19 Whistleblower story against VOA Roseville this conspiracy can be proved with a totality of the circumstances looked at the whole, He was clearly trained by the fBOP as an investigator thus knew the defects in the timeliness of the reports, the overreaching in the 103 assault and the fabrication of evidence in felicia Perez's "Federal Acknowledgement", also his ignoring my plea for reasonable staff rep Since fBOP Policy Not available at Renville County Jail denied access to courts. Defendant Forhonen is Guilty of conspiring in the revenge plot and false imprisonment of plaintiff.

①. On 08/28/2020, I had Expressed my concern with Ashley Sylkorn, Defendant,

about my treatment throughout the Covid-19 out Break, Ashley Sykora had simply told me that my actions had cause me all what I deserved. I reported the COVID-19 out Break to Minnesota Department of Health, U.S Congresswoman Betty McCollum's office, Several State Representatives all of who expressed concern and started to reach out to the VOA-Roseville. On 09/02/2020, On the front Page Above the fold on the St. Paul Pioneer Press ran the story of the COVID-19 outbreak in Roseville VOA... Ashley Sykora personally told me that she would never approve me to go to Home confinement, a home pass or any non-essential pass. This was reflected immediately after I finally got off quarantine a whole extra 2 weeks more than any other Negative inmate punishment covered up as "possible exposur" even though we were quarantined. I was refused a "hygiene pass" because I was working full time but the time it took me to get to work and back also counted as hours out and I was told I would need to quit my job if I wanted to get a hygiene pass, my Pass privileges had been stripped from Felicia Perez and taken over exclusively by Ashley Sykora and Josue Garcia. It is Ashley Sykora's official duty to make sure that All of her employees including Josue, Ryan, Felicia are abiding by FBoP Policy and the Federal federal Regulations... It is without reason to believe that she was unaware that Felicia Perez had stopped doing orientations and giving inmates "Notice of the inmate Discipline Program" and the VOA-RRC rules and regulations and that she was just forging inmates signature. I'm not certain if Ashley Sykora eventually signs off on all these inmate intake packets but during a discovery we could find mine and under seal how many other inmates

has Ashley Sykora just turned the blind eye to her employees omissions...  
 On 09-30-2020 Ashley Sykora wrote me two incident reports, first, a  
 101 (serious bodily harm Assault) and 102 escape... It is Ms Sykora's official Duty  
 to be familiar with fBOP violations, as stated above a 101 is akin to a  
 1st degree Assault or Attempted Murder, it usually entails weapons, victim  
 going to the hospital multiple perpetrators thus the possible sanction is  
 way more severe... Also the fBOP has No "Self Defense Clause" if you  
 get in a confrontation you either can "run or Ball up" if you fight back  
 in any way even to get away, its exactly that you "fought back" and  
 at most inmates can be charged with is a 201 fighting... In this case  
 as I've stated above Mathew Taylor was an agent of the conspiracy  
 to retaliate against me for making the VOA look bad... Mr. Taylor never  
 was disciplined for his fighting back as feasible as it may have been he swung  
 back thus Ashley Sykora stated she reviewed the video footage which must  
 clearly show a fight even if I'm clearly "winning" it doesn't matter it's a  
 fight but Ashley Sykora is 'Top player of the VOA conspiracy and smartest  
 the most shielded but clearly she wrote me up but not him... She also failed  
 to review the Evidence such as this fabricated "federal acknowledgement" which  
 as program manager if at any moment she noticed this or cared enough to  
 she could have called Brenda Mart and told her of the mistake but  
 then that again makes the VOA look bad and with the Bad press  
 already this year Ashley Sykora Deliberately and callously ignored  
 this fact and ignored the fact that My Disciplinary Process

Was untimely because the VOA and Ashley Sylcorna was getting what they wanted, which was revenge. As stated above on 9/30/2020 I was also written up for escape, this whole incident report is based off the assumption that I received a copy and signed the VOA-RPC rules and regulations along with the fBOP rules. Specifically pages 23,24 of the VOA-RPC rule book... Well in order for Ashley to have wrote this incident report she had to have gone and clearly seen with her own two eyes this "federal acknowledgement" form with the fabricated "COVID-19" signature that her staff Defendant Felicia Perez created, now instead of immediately calling Brenda Mort and explaining that they probably don't even have probable cause to have a U.S. Marshall warrant for my escape since I never agreed to stay or acknowledged the punishment if I left as I stated before I assumed I'd get a probation violation not jail time but Defendant Ashley Sylcorna Didn't want Brenda Mort and the fBOP attention on them any more since the Bad press so she covered it up she deliberately is indifferent to the pain and suffering I may suffer and have suffered directly because of her actions all stemming from her original refusal to allow me to leave to go get an apartment right after my arrival at the VOA because of her GREED they want this federal contract so bad and hope to expand even to house more federal inmates, So she weighed this against my constitutional rights and she chose to violate mine. Ashley Sylcorna, is Program director at the Volunteers of America MN/WI which is licensed by the Minnesota Department

of corrections, thus all of her actions can be viewed as under the color of state law or authority the VOA also is a federal contractor and thus her position would give her the authority or color of it under federal law either way she violated my Constitutional rights under both or either. She conspired to with others known and unknown to violate my 8th Amendment and potentially get me assaulted but when I beat up their hit man they wrote me up but not him for our "fight". She conspired with codefendants, Perez, Garcia, Korhonen to violate my 5th Amendment procedural due process rights by untimely processing everything and denying me access the fBOP Policy at hearing or a adequate staff rep and she violated my rights by engaging with others to fabricate evidence to get a "conviction" and "false imprisonment" by the "federal acknowledgement" form she deliberately ignored to address with her stuff or the fBOP.

#### E. Defendant Ned G. Wohlman, Renville County Jail administrator

On 11-28-2020 I wrote a grievance to Ned about my Good time he wrote back an interesting thing about the DHO, he wrote that I would not attend the final DHO determination, I assumed he was wrong but I followed his advice and wrote numerous grievances to the region about my Good time and the untimely disciplinary process also about this "theory about me not attending DHO" I never received one reply to this Day. On 12-02-2020, I turned into Jail staff a "Sealed" envelope with a 28 USC 2241 writ of habeas corpus, the Respondent was Ned Wohlman the envelope was a standard envelope packed full barely holding after sealing.

the check personally in the envelope myself the envelope barely held,  
 staff promised to add tape to it... Well simultaneously I filed a Compassionate  
 Release Due to Major Covid-19 out break here at R.C.J, so weekly I'd  
 call and check with courts as to status of my "motions" but for a couple of  
 weeks I kept being told they still had not received a copy of my habeas  
 corpus finally on 12/21/2020, I wrote defendant a "Kite" inquiring into  
 where my motion could possibly get lost, I had previously grievanced  
 that ~~R.C.J.~~ Does not offer "Certified" mail or any other way to  
 "insure" an inmates legal mail reaches its destination besides commissary  
 stamps... Well Ned responded with a Complete lie, I am uncertain  
 as to how Defendant Ned obtained my Writ of Habeas corpus and then  
 felt it was within his legal authority to open my "sealed" mail to the  
 court I have no idea but what I do know is this, his lie  
 about reprinting a check is a lie, I placed the check in the  
 envelope and a printout of my account shows no other activity  
 of cancelled checks or reprints etc... After he replied I had grievanced  
 him both electronically and on paper that I would be pursuing litigation  
 for him feeling he could just bust open my legal mail and he  
 never responded... On 12-28-2020 magically my motion arrived  
 at the U.S. District Court on 12-30-2020 Magistrate Judge Approved  
 my Expedited proceedings and also I received a Notice and so did a court  
 that U.S. Attorney Chad Blumenfield wanted to jump on the case  
 because I named a Non-federal Respondent Ned Wohlman and the United

States Doesn't represent him. The court allowed him, he had 7 days to respond to my 28 USC 2241, in 6 days I received a 20+pg response from him with almost 70+pgs of additional Affidavits from FBOP Defendant Jeffery George and another FBOP employee..

It was insane because plaintiff was witnessing 1st hand how backlogged DHO was yet they had the time to prepare all this in under 6 days? Then on late January I received my denial from my compassionate release, I was shocked because Defendant Ned told me that on about Dec. 22, 2020 that my actual Federal Judge had called the jail to talk about the COVID-19 situation. I asked Ned at the time if he was honest and he said "he wouldn't ever lie to a judge besides he wants me to go home just as much as myself.". Well in Judge Doty's opinion the court basically called me a liar and said there was no COVID-19 inmates here. So I've included an incident report of another federal inmate who only a week earlier was forced to move into a unit which every inmate currently housed in that unit was COVID-19 positive but just like VOA Defendants, Greed is the motive instead of filing motions to release short time federal inmates RCJ under order from Ned forced us to co-mingle with COVID-19 inmates.. In any case this got me back to thinking that its very likely that Ned had made a copy of my 28 USC 2241 and sent it to someone in the FBOP. Whether by fax, mail, or Email may be he described it by mail in discovery it would come out, Ned likes to bend the truth

and uses his authority as Jail administrator of Renville County  
 Jail, a State authority or law enforcement authority to do whatever  
 he pleases he abuses his own grievance system, and literally plucks  
 your outgoing mail if he is suspicious of its contents, and any appeals  
 to Brenda Mort all go unanswered same with Regional Directors  
 office in Kansas... Ned G Wohlman is Jail Administrator at the  
 Renville County Jail annex of the Renville County Sheriff's office and his authority  
 comes from the Minnesota Department of Corrections and the RRC is also a RRC  
 and has a federal contract just like the VOA so his actions also have the  
 authority under federal law as it pertains to his actions against federal  
 inmates such as myself. Ned Wohlman, has violated my 1st Amendment  
 by denying me access to the courts, both in the US district court and by  
 Denying me access to fBOP <sup>Policy</sup> and EFR to defend myself in disciplinary  
 proceedings, He has illegally seized my legal mail thus subjecting me  
 to a multitude of damage of my constitutional rights in this one act both the  
 4th Amendment for the illegal seizure then also for my false imprisonment which  
 resulted because of his action, 5th Amendment procedural rights were greatly  
 affected adversely I had asked that my motion be adjudicated by December 30th  
 I wanted that as my release date yet its my belief he sent my motion  
 to the fBOP and allowed them the unfair advantage to overwhelm the courts  
 with "filler" thus confusing the issue. Ned G Wohlman did all these acts  
 Deliberately he did it feeling he was well within his rights as the  
 Jail boss to do what he needs to to keep the peace around here

and that was the 1st time his name had ever been in a federal court document so he sought out advice from "the feds" this was done with deliberate indifference to the impact it would have on my outcome of my case and the hardship it would cause.

F. Brenda Mort, Defendant Brenda Mort, plaintiffs claim against her would be based solely on her deliberate indifference to the retaliation that plaintiff had been experiencing the whole time at VOA Roseville plaintiff has called and wrote numerous times to Brenda Mort begging for help but she ignored all plead for help. She ignored my grievances when I showed her incident reports were untimely and the VDC was too and they violated FBO P Policy, C.F.R. etc. It is clear that it is her responsibility to make sure that federal inmates housed in RRCs are in well regulated facilities in compliance with FBO P Policy and Code of federal Regulation but she deliberately ignored all of my plead... Brenda Mort is employed by the federal Bureau of prisons and official duties are under the color of federal Law.

It is my belief that it is Brenda Mort who Defendant Ned Wohlman Contacted and sent my 28 USC 8241 habeas corpus form if this were to prove out then Brenda Mort would be guilty of Conspiracy to Violate my 5th Amendment, 1st Amendment, 4th Amendment rights and it is without question that she would know that snooping a federal inmate Sealed outgoing legal mail is not only illegal but its beyond an apology

its the only explanation plaintiff can come up with how  
 US attorney jumped on cases fast and had so much just ready  
 in 5 days especially since plaintiff filed another 28 USC 2241  
 on 2-18-2021 and I just received notice today that I guess chad blumenfield  
 wants to jump on that case on 3-5-2021 so that's a huge difference  
 why was chad Blumenfield "waiting in the bushes" on my other 2241?  
 Only because he knew it was coming right? The feds do love a good conspiracy  
 and its just what I see.

## 6. Jeffery George, Disciplinary Hearing officer,

On 12-30-2020 and 12-31-2021, a DHO hearing was held  
 without me in appearance, either telephonically or by Zoom or in  
 person. All in violation of F BOP Policy and 28 CFR 541.8(e)  
 which from Defendants own Declaration he has been a DHO for over  
 10+ yrs and is well aware of the policy thus was aware that this would  
 Deny me a fair opportunity to present facts in my defense including the  
 untimeliness which even in his report DHO findings that everything was okay  
 and standards were met in WOLFF, well, WOLFF never had the type  
 of procedural Due process issues presented thus DHO confused the issue.  
 Jeffery George an Employee of the Federal Bureau of Prisons Thus all of  
 his actions are under the color of federal law. which he violated by 5th  
 Amendment procedural Due Process by just rubberstamping and ignoring his duty  
 to perform a DHO with me in appearance. He relied on VOA fabricated evidence

of the federal acknowledgement and ignored all fBOP Policy as far as timing and "escaped" inmates go. Thus he should have just Dismissed the whole action instead of Rubber stamping than punishing me worse than Plaintiff ever been sanctioned before.

H. Renville County Jail, Entity Defendant,

RCJ is a state facility a county jail type facility that is annexed with the Renville county sheriffs office, RCJ has several Policies here that have led ~~to~~ plaintiffs current constitutional violation. They refuse to allow an inmate to pay for any type of other shipping or mail other than "regular" stamps which they routinely run out of and have caused me to miss a court ruling. which constitutes a denial to access to courts even a reasonable standard. if I have a 7 day deadline and there is no stamps for 7 days and no other options I'm denied access to courts. The RCJ has no legal mail accountability program for staff, like they took my sealed mail I assumed I was good RCJ has no Book or log of outgoing legal mail of what guard "sent what out to where from who" to ensure mail isn't diverted to Ned's office for a month. I have attempted to write the media and I assume they never got my letters and I've also wrote law enforcement I assume the same. I've filed another ~~42~~ 42 USC 1982 Civil Rights violation about covid which never reached the courts so clearly either there is a Rogue Postal worker out here or RCJ needs to be held accountable. They don't have any FEDERAL Bureau of Prisons

Policy for inmates to use in their disciplinary proceedings. I have been threatened by Jail guards and attempted to report it to Ned who was not interested in talking about it he wouldn't give me this IPP Affidavit I had to get it from Melissa swyter. They are disorganized and Don't answer grievances and there is no recourse its an unsafe, unsanitary environment. RCJ is a state licensed facility under the color of state authority also Contract federal facility thus under the color of federal law also as it pertains to plaintiff. Renville County Jail should be held liable for the actions of its employees for its failure to implement a "Legal mail" procedure which is pretty standard across America.

I. Volunteers of America MN/WI, Roseville PRC, Entity Defendant

VOA is Licensed by the Minnesota Department of Corrections thus operates under the color of state law also as a federal Contract facility to house federal inmates, thus also operates under the color of federal law. VOA Roseville pretends to be a christian faith based program. This when looking above at defendants named in action above would prove false the only Administrative level "faith" person is Cheryl who was possibly ostracized by her association to me at the facility all the other Case managers except Vanessa are vindictive, judgemental, hypocrites, they abuse their power vested in them to gain favor of inmates in "kickbacks"

The VOA should be held responsible for its Charter in Rosevilles actions, whether VOA Roseville actions are widespread in fabricating documentation in not complying with the Federal Contract terms and safety terms, its clear that with

a discovery it will show how Defendant Felicia Perez and possibly other  
 case managers just stopped doing the intake orientation and forcing everyone  
 with "COVID-19" or maybe just Felicia Perez. Also it would be  
 easy to find out how many inmates that got sent to RCJ from  
 VOA Roseville actually got sanctioned between the months of September 2020  
 and February 2021. Not just sent to jail theres a difference because  
 the DHO guy takes way too much good time this will show that if  
 a vast majority never got sanctioned its because the DHO is backed up  
 but a phone call from VOA staff for RCJ or Brenda Mort will guarantee  
 sanctions. If all of the Administrative Level staff at the VOA are  
 engaged in the conspiracy to violate my 5th Amendment procedural due  
 process rights and to engage in vindictive prosecutorial practices by using  
 pure forged documents to get a conviction in Disciplinary proceedings to  
 put me in jail and take my good time also in the 8th Amendment conspiracy  
 the VOA Roseville MN/WI should be held liable because they left no  
 higher authority to seek help from especially since Brenda Mort  
 ignored the pleas, Ashley Sykora was the highest VOA employee I could  
 find thus VOA made it impossible to report or grievance its employees  
 thus it should be liable for their actions.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to as Additional Facts and continue to letter the paragraphs consecutively.

#### V. REQUEST FOR RELIEF

State briefly exactly what you want the Court to do for you. Do not make any legal arguments or cite any cases or statutes.

Punitive Damages of \$750,000 as jury or court finds fit  
Injunctive Relief against Defendants VOA, RCJ and Jeffery George, Order All three comply with  
fBOP Disciplinary Policy and CFR, RCJ must implement a improved Legal mail system which  
ensures accountability... Brenda Mort if culpable in conspiracy/250,000

Damages: Against Ashley Sykora individually and official I seek \$250,000  
Josue Garcia individually and officially \$ 500,000. Ryan Korhonen \$50,000 individual and  
in official capacity, Felicia Perez individual and official \$1500,000.  
Ned Gwaltman individual and official \$500,000

Defendants Renville County Jail and VO Volunteers of America should be  
held Culpable and financial responsible for the actions and policy of their  
employees I seek whatever Defendants can't pay their Entity be held liable  
I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my  
(our) information, knowledge, and belief.

Signed this 9th day of March, 2021

Signature(s) of Plaintiff(s)



104 South 4th Street

Olivia MN 56277

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

Q6